



Arizona State Board of Pharmacy

Physical Address: 1616 W. Adams, Suite 120, Phoenix, AZ 85007

Mailing Address: P.O. Box 18520, Phoenix, AZ 85005

P) 602-771-2727 F) 602-771-2749 <https://pharmacy.az.gov>

****The following FAQs are being actively updated. Please check back frequently for any modifications.****

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Arizona Controlled Substances Prescription Monitoring Program

Electronic Prescribing of Controlled Substances (EPCS) Pharmacy Requirements

Beginning **January 1, 2020**, a schedule II controlled substance that is an opioid may be dispensed only with an electronic prescription order as prescribed by federal law or regulation. This mandate was waived in March of 2020 due to COVID Executive Order 2020-20, and this order was rescinded July 2021. Beginning July 9, 2021 schedule II controlled substances that are opioids may only be dispensed with an electronic prescription order.

This is a statutory mandate to all pharmacies receiving Schedule II opioid prescriptions, with the exception of federal facilities (Indian Health Service, Department of Veterans Affairs, and Department of Defense), as they are not subject to state law.

DISPENSERS FREQUENTLY ASKED QUESTIONS:

What is EPCS?

EPCS stands for Electronic Prescribing of Controlled Substances and may also be referred to as e-Prescribing of Controlled Substances.

What does EPCS-certified mean?

In 2010, the Drug Enforcement Administration (DEA) issued regulations permitting prescribers to write prescriptions for controlled substances electronically. A practitioner is able to issue electronic controlled substance prescriptions only when the electronic prescription or electronic health record (EHR) system the practitioner is using is EPCS-certified. In order to be EPCS-certified, the system must meet strict DEA requirements for credentialing, software certification and dual factor authentication.

What is the difference between e-Prescribing and EPCS?

Electronic prescribing, or "e-Prescribing," allows health care providers to enter non-controlled substance prescription information into a computer device and securely transmit the prescription to pharmacies using a special software program and connectivity to a transmission network. EPCS-certified systems allow health care providers to submit electronic prescriptions for schedule II-V controlled substances. EPCS-certified systems are specialized systems that must meet strict DEA requirements for credentialing, software certification, and dual factor authentication.



Is it true that all Arizona pharmacies must be able to receive controlled substance prescriptions electronically?

Beginning **July 9, 2021**, a schedule II controlled substance that is an opioid may be dispensed only with an electronic prescription order as prescribed by federal law or regulation. This is a statutory mandate to all pharmacies receiving Schedule II opioid prescriptions, with the exception of federal facilities (Indian Health Service, Department of Veterans Affairs, and Department of Defense), as they are not subject to state law.

Do Schedule II opioid prescriptions from out-of-state prescribers need to be electronically submitted?

Per §36-2525(D)...a pharmacy may sell and dispense a schedule II controlled substance prescribed by a medical practitioner who is located in...another state if the prescription was issued to the patient according to and in compliance with the applicable laws of the state of the prescribing medical practitioner and federal law.

Can I fill a written prescription for a schedule II opioid if the provider's electronic prescribing system or my pharmacy management system is not operational?

Yes. As per §36-2525(D)(1), if the electronic prescribing system or a pharmacy management system is not operational, the pharmacist may dispense a prescription order that is written for a schedule II controlled substance that is an opioid. The pharmacist must maintain a record, for a period of time prescribed by the board, or when the electronic prescribing system or pharmacy management system is not operational.

Can outpatient pharmacies fill handwritten prescriptions from federal facilities?

Yes. As per §36-2525(D)(2), a pharmacist may dispense a prescription order if the prescription order for a schedule II controlled substance that is an opioid is in writing and indicates that the medical practitioner who issued the prescription order provided care for the patient in a veterans administration facility, a health facility on a military base, an Indian Health Services hospital or other Indian Health Service facility, or a Tribal-owned clinic.

What are the next steps for pharmacies if compliance is not met with becoming EPCS capable?

The Board of Pharmacy will enforce provisions through the opening of and receiving of complaints.



If a patient presents a pharmacist with a hard copy of a schedule II opioid prescription that does not indicate the EPCS system was down when they were given the prescription, can the pharmacist call the prescriber to confirm that the EPCS system was down and record that on the hard copy of the prescription?

Yes. Pursuant to A.R.S. §36-2525(B) the pharmacist must document on the original prescription order the changes that were made pursuant to the verbal authorization and record the time and date the authorization was granted.

The pharmacist must speak with the prescriber for authorization and cannot speak with a prescriber's representative.

If I receive a prescription for a schedule II opioid that was handwritten before July 9, 2021, can I fill it?

Yes, the prescription may still be filled by the pharmacist assuming all other legal requirements are met.

If the strength, directions, or quantity of medication is incorrect on a schedule II opioid prescription sent by way of EPCS, can a pharmacist call the prescriber to correct?

Yes. Pursuant to A.R.S. §36-2525(A)...If authorized verbally by the prescriber, the pharmacist may make changes to a written or electronic schedule II controlled substance prescription order, except for the following:

1. The patient's name
2. The prescriber's name
3. The drug name

The pharmacist must document on the original prescription order the changes that were made pursuant to the verbal authorization and record the time and date the authorization was granted.

The pharmacist must speak with the prescriber for authorization and cannot speak with a prescriber's representative. The EPCS prescription should be electronically annotated with the prescriber-authorized changes (See 21 CFR §1311.200 (f)).

If I receive a handwritten prescription for a compounded medication that includes a schedule II opioid, can I fill it?

The proposed language regarding compounded medications is as follows:

A pharmacist may dispense a schedule II opioid controlled substance from a written rather than electronically transmitted prescription order if the prescription order is written for a medication that requires compounding two or more ingredients.

This exception is currently undergoing the rulemaking process, but has not yet been enacted. Please continue to check administrative codes and these FAQs for further updates.





If I receive a handwritten prescription for a schedule II opioid that is not currently in the prescriber's EPCS database, can I fill it?

The proposed language regarding medications not in the EPCS database is as follows:

A pharmacist may dispense a schedule II opioid controlled substance from a written rather than electronically transmitted prescription order if the prescription order is written for a medication that is not in the E-prescribing database. The pharmacist is not required to verify whether the medication is not in the E-prescribing database.

This exception is currently undergoing the rulemaking process, but has not yet been enacted. Please continue to check administrative codes and these FAQs for further updates.

What steps should I take if I believe a prescriber's EPCS system has been down for an extended period of time?

If you believe that a prescriber does not have an EPCS system or the prescriber's system has been down for an extended period of time, please fill out the form found here:

<https://forms.gle/3fu63smXv3Brg2o69>.

The Board of Pharmacy will collect the information and share it with the prescriber's respective licensing board.

If I receive a faxed prescription order for a schedule II controlled substance that is an opioid for a patient enrolled in hospice care, can I still fill it?

Yes. Pursuant to A.R.S. §36-2525(F)(3), a patient's medical practitioner or the medical practitioner's agent may transmit to a pharmacy by fax a prescription order written for a schedule II controlled substance, including opioids, if the prescription order is for a patient who is enrolled in a hospice care program that is certified or paid for by Medicare under title XVIII or a hospice program that is licensed by this state. The medical practitioner or the medical practitioner's agent must note on the prescription that the patient is a hospice patient.

If I receive a faxed prescription order for a schedule II controlled substance that is an opioid for a patient registered to a long-term care facility (LTCF), can I still fill it?

Yes. Pursuant to A.R.S. §36-2525(F)(2), a patient's medical practitioner or the medical practitioner's agent may transmit to a pharmacy by fax a prescription order written for a schedule II controlled substance, including opioids, if the prescription order is for a resident of a long-term care facility.

Is a skilled nursing facility (SNF) considered a long-term care facility (LTCF)?

Yes. During the September 26, 2019 Board of Pharmacy meeting, the Board moved to better define long-term care facilities to include skilled nursing facilities.



If I receive a handwritten prescription for a schedule II controlled substance that is an opioid written by a veterinarian, can I fill it?

Yes. As per §36-2525(R) veterinarians are currently exempted from the EPCS requirements until the Arizona state veterinary medical examining board determines that electronic prescribing software is widely available for veterinarians and notifies the Arizona State Board of Pharmacy of that determination.

